UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-10995-RCL

ALTAGRACIA J. PEGUERO,
Plaintiff,

v.

AMERICAN EXPRESS COMPANY,
THE SKLOVER GROUP, INC.
and FEDERAL INSURANCE
COMPANY,
Defendants.
)

ASSENTED TO MOTION TO ENLARGE TIME TO RESPOND TO MOTION TO DISMISS AND COMPEL ARBITRATION

Pursuant to Local Rule 7.1, the Plaintiff, Altagracia J. Peguero, respectfully moves this Court for leave to enlarge her time to respond to the Motion to Dismiss and Compel Arbitration in the above-captioned action, which was filed on May 31, 2005, through and including June 21, 2005.

- (1) All Defendants have assented to this motion.
- (2) The Motion to Dismiss and Compel Arbitration, which, if allowed, would deprive the Plaintiff of her right to a jury trial, raises many legal issues. The additional time sought is necessary for the Plaintiff to properly research and brief these issues, as well as to obtain affidavits, if necessary.

There have been no previous requests for any (3) enlargement of time by the Plaintiff with respect to this Motion.

For the foregoing reasons, Plaintiff respectfully move this Court to allow the Motion.

> Respectfully submitted, THE PLAINTIFF,

By her Attorney,

Kevin Donius, Esquire Corcoran, FitzGerald & Hennessy

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(617) 696-6704 FAX BBO#: 551298

June 10, 2005 Date:

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

The Plaintiff, by and through counsel, hereby certify that she has conferred with counsel of record for all Defendants in a good faith attempt to resolve or narrow the issues raised in this motion and that the Defendants, acting through counsel, have assented to the granting of the relief sought herein.

Kevin Donius, Esquire

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the above document was served upon the attorney of record for each party by meil / by harid.